

MEMO ENDORSED

# ZMO LAW PLLC

February 22, 2023

*Via ECF and email*

Hon. Andrew L. Carter  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 2-23-23

RE: *United States of America v. Darnell Feagins*, 20-CR-218 (ALC)

Dear Judge Carter:

This office represents Darnell Feagins in the above-captioned matter. We write to request an extension of our time to file the defense sentencing memorandum, which is currently due tomorrow, and an adjournment of the sentencing. The presentence report has not yet been completed, and as such we are not able to complete our sentencing memorandum. We would request that sentencing be adjourned to a date in early April, giving us time to review the presentence report after receiving it and finalize our sentencing memorandum leading up to that date.

We contacted the government to request consent but have not yet received a reply.

Thank you for your attention to this case.

Very truly yours,

*Tess Cohen*

Tess Cohen  
Attorney and Counsellor at Law

CC: AUSA Cecilia Vogel

*The entire application is granted.  
The sentencing is adjourned to 4/10<sup>6</sup>/23  
at 2<sup>3:30</sup> p.m.  
So Ordered. ✓  
*Andrew L. Carter*  
2-23-23*